

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND
REVISED SUMMARY OF THE DEPOSITION OF MANUEL MATIAS**

Plaintiff, ePlus, Inc. ("ePlus"), through counsel, hereby submits the following specific objections to Defendant Lawson Software, Inc. ("Lawson")'s Counter-Deposition Designations of the deposition of Manuel Matias and offers the following counter-counter designations and revised summary:

Specific Objections

Defendant's Counter Designations	ePlus's Objections to Defendant's Counter Designations	ePlus's Counter-Counter Designations
11:9-12		
20:7-15	403	
27:18-28:11	403; 701	
29:2-14		
43:7-44:24		
47:13-48:5		
49:4-17		
50:23-51:4		

Revised Summary

Designated testimony relates to:

Mr. Matias is an employee of Robert Wood Johnson University Hospital (“RWJUH”). (5:22-25)

Currently RWJUH licenses the Requisitions Self Service application and the Purchase Order, Requisitions, Inventory Control, and EDI modules. (10:13-11:8; 11:13-15) RWJUH also licenses the Microsoft add-ins from Lawson that are used in conjunction with the Lawson procurement software. (11:16-12:2) The Lawson system went live approximately four months prior to the deposition. (12:4-8) The implementation of the Lawson procurement software began in April 2009 and took approximately seven months. (12:23-13:6)

The Item Master, which is called IC11, houses all inventory supplies, both stock and non-stock, and includes Lawson item numbers, item descriptions, units of measure, and manufacturer numbers for items. (13:12-23) RWJUH has approximately 36,000 items from approximately 3,000 vendors in its Item Master, including medical and surgical supplies, laboratory supplies, gastroenterologist supplies, screws, bolts, bandages, gauzes, IV solutions, reagents, hip implants, stents, gowns, gloves, and pacemakers. (14:21-15:9; 16:7-10) Some of the larger vendors for RWJUH are Owens & Minor, Medtronic, and Synthes. (19:9-20)

The Requisitions Self-Service application allows users to search for items according to criteria that includes item description, manufacturer number, and catalog number. (17:7-24)

Purchase orders are generated in the Lawson S3 system through the PO100 program. (32:17-33:3) Multiple purchase orders can be generated from a single requisition containing items from multiple vendors. (77:17-78:7) Purchase order acknowledgements received by RWJUH through Global Healthcare Exchange provide information on the availability of items ordered from vendors, such as whether the item has been back ordered. (34:12-35:5; 36:16-20)

Mr. Matias provided a recorded demonstration of the Lawson S3 system used at RWJUH. (38:10-18; 42:3-43:6; 44:25-45:4; 48:6-49:3; 49:18-50:22; 51:5-51:8; 52:19-54:20; 55:8-13; 56:4-57:4; 60:12-62:25; 63:17-64:6; 64:10-65:5; 65:7-9; 65:23-25; 66:2-18; 70:20-73:20; 75:2-14; 78:16-82:8; 91:12-93:9) Mr. Matias demonstrated searching for items from different manufacturers (e.g., gowns, solutions) and building requisitions for those items using the “search catalog” feature in Requisitions Self-Service as well as the RQ10 program in the Requisitions module. *Id.* Mr. Matias also demonstrated generating purchase orders from the requisitions created in Requisitions Self-Service. *Id.*

Respectfully submitted,

/s/

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Dated: August 11, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

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with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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